

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

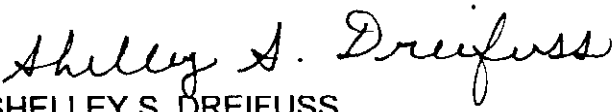
Postal Rate and Fee Changes, 1997)

Docket No. R97-1

ANSWER OF THE OFFICE OF THE CONSUMER ADVOCATE
TO INTERROGATORY OF UNITED STATES POSTAL SERVICE
WITNESS: JAMES F. CALLOW (USPS/OCA-T500-29)
(February 5, 1998)

The Office of the Consumer Advocate hereby submits the answer of James F. Callow to interrogatory USPS/OCA-T500-29, dated January 22, 1998. The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,


SHELLEY S. DREIFUSS
Attorney
Office of the Consumer Advocate

ANSWER OF OCA WITNESS JAMES F. CALLOW
TO INTERROGATORY USPS/OCA-T500-29

USPS/OCA-T500-29. Please refer to your testimony at page 48, lines 8 to 10.

(a) Please confirm that in FY 1996, only 0.329 percent of all weighted tallies for cost segment 3 post office box and caller service costs were mailhandler tallies, while 99.671 percent were clerk tallies. If you do not confirm, please explain why not.

(b) Please confirm that, using these percentages, one would estimate volume-variable mailhandler costs to be \$235,000, or 0.329 percent of Cost Segment 3 volume-variable post office box and caller service costs of \$71,527,000.

(c) Do you believe that this \$235,000 estimate or the \$12,039,000 estimate in your testimony is a better estimate for mailhandler costs for post office box and caller service? Please explain your reasoning.

A. (a) - (c) Unable to confirm. I am unfamiliar with, and do not recognize, the percentages cited, nor do I know how they were developed. Please note that no source documents have been cited or provided.

DECLARATION

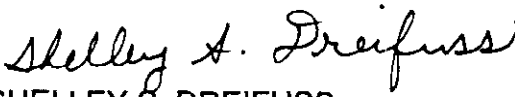
I, James F. Callow, declare under penalty of perjury that the answer to
interrogatory USPS/OCA-T500-29 of the United States Postal Service is true and correct,
to the best of my knowledge, information and belief.

Executed 2-5-98

James F. Callow

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.


SHELLEY S. DREIFUSS
Attorney

Washington, DC 20268-0001
February 5, 1998